

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

PETERSEN ENERGÍA INVERSORA, S.A.U. AND PETERSEN ENERGÍA, S.A.U.,

Plaintiffs,

15 Civ. 02739 (TPG)

-against-

ARGENTINE REPUBLIC, AND YPF S.A.,

Defendants.

STIPULATION AND LAND ORDER REGARDING DEFENDANT ARGENTINE REPUBLIC'S TIME TO RESPOND TO THE COMPLAINT

WHEREAS, on April 8, 2015, Plaintiffs Petersen Energía Inversora, S.A.U. and Petersen Energía, S.A.U. (together, "Plaintiffs") filed a Complaint against the Argentine Republic ("Argentina") and YPF S.A. ("YPF") in the above-captioned action;

WHEREAS, on or about June 12, 2015, Plaintiffs assert that they perfected service on Argentina under the service provisions of the Foreign Sovereign Immunities Act ("FSIA"), 28 U.S.C. § 1608(b)(2);

WHEREAS, the FSIA, 28 U.S.C. § 1608(d), provides Argentina 60 days to respond to the Complaint after service of process has been made; and

WHEREAS, Argentina and Plaintiffs agree that it would advance the interests of judicial efficiency to avoid any dispute over the validity of service in this action and agree on a briefing schedule for Argentina's motion to dismiss the Complaint;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the parties and subject to the approval of the Court, that:

1. The parties deem service of the Complaint to have been made without

waiving any jurisdictional defense (personal, subject matter or otherwise) that Argentina

may have under the Foreign Sovereign Immunities Act or otherwise.

2. Argentina shall file and serve its answer or motion to dismiss the

Complaint on or before September 8, 2015.

3. If Argentina moves to dismiss the Complaint, Plaintiffs shall file and serve

any opposition to Argentina's motion to dismiss by no later than 40 days after electronic

service of Argentina's motion to dismiss.

4. Argentina shall file and serve its reply to Plaintiffs' opposition on or

before 20 days after electronic service of Plaintiffs' opposition.

5. This stipulation shall not affect the separate deadlines stipulated to by

Plaintiffs and YPF and so ordered by the Court on June 10, 2015 (Dkt. 9).

6. The due dates contained herein shall be computed in accordance with

Federal Rule of Civil Procedure 6.

7. Argentina reserves any and all defenses to this action, including but not

limited to, the personal jurisdiction of this Court over it or the Court's jurisdiction over

the subject matter of this action.

Dated: July 30, 2015

Respectfully submitted,

AKERMAN LLP

By

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Attorneys for Plaintiffs Petersen Energia Inversora, S.A.U. and Petersen Energia, S.A.U.

SO ORDERED this 31 day of July, 2015

HONORABLE THOMAS P. GRIESA UNITED STATES DISTRICT JUDGE

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